

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

|                          |   |                       |
|--------------------------|---|-----------------------|
| UNITED STATES OF AMERICA | : | CR. NO. 1:16-CR-00080 |
|                          | : |                       |
| v.                       | : |                       |
|                          | : | (JUDGE KANE)          |
| STEPHEN CHANG,           | : |                       |
|                          | : |                       |
| Defendant.               | : |                       |

**SUPERSEDING INFORMATION**

THE UNITED STATES ATTORNEY CHARGES:

**COUNT 1**

(Travel with Intent to Engage  
in Illicit Sexual Conduct)

On or about December 13, 2014, in Dauphin County, within the Middle  
District of Pennsylvania, the defendant,

**STEPHEN CHANG,**

did travel in interstate commerce for the purpose of engaging in any illicit  
sexual conduct, as defined in Title 18, United States Code, Section 2423(f),  
with a 13 year old female.

All in violation of Title 18, United States Code, Section 2423(b).

THE UNITED STATES ATTORNEY FURTHER CHARGES:

**COUNT 2**

(Travel with Intent to Engage  
in Illicit Sexual Conduct)

On or about October 2, 2015, in Dauphin County, within the Middle  
District of Pennsylvania, the defendant,

**STEPHEN CHANG,**

did travel in interstate commerce for the purpose of engaging in any illicit  
sexual conduct, as defined in Title 18, United States Code, Section 2423(f),  
with a 14 year old female.

All in violation of Title 18, United States Code, Section 2423(b).

THE UNITED STATES ATTORNEY FURTHER CHARGES:

**COUNT 3**

(Travel with Intent to Engage  
in Illicit Sexual Conduct)

On or about March 5, 2015, in Dauphin County, within the Middle  
District of Pennsylvania, the defendant,

**STEPHEN CHANG,**

did travel in interstate commerce for the purpose of engaging in any illicit  
sexual conduct, as defined in Title 18, United States Code, Section 2423(f),

with a 14 year old female.

All in violation of Title 18, United States Code, Section 2423(b).

THE UNITED STATES ATTORNEY FURTHER CHARGES:

**COUNT 4**

(Coercion and Enticement)

On or about December 13, 2014, in Dauphin County, within the Middle District of Pennsylvania, the defendant,

**STEPHEN CHANG,**

did use any facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce 13 year old Victim 1 to engage in any sexual activity for which any person could be charged with an offense.

All in violation of Title 18, United States Code, Section 2422(b).

THE UNITED STATES ATTORNEY FURTHER CHARGES:

**COUNT 5**

(Coercion and Enticement)

On or about January 9, 2016, in Bakersfield, California, within the Central District of California, the defendant,

**STEPHEN CHANG,**

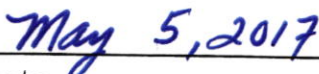


did use any facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce 14 year old Victim 2 to engage in any sexual activity for which any person could be charged with an offense.

All in violation of Title 18, United States Code, Section 2422(b).

BRUCE D. BRANDLER  
United States Attorney

  
DARYL F. BLOOM  
Assistant United States Attorney

  
Date